

# DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D. C. 20268-0001

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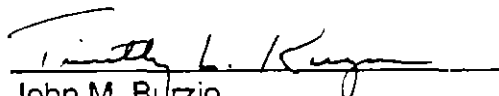
POSTAL RATE & FEE CHANGES, 1997

Docket No. R97-1  
OFFICE OF THE SECRETARY

## FOLLOW-UP INTERROGATORIES OF TIME WARNER INC. TO UNITED STATES POSTAL SERVICE WITNESS DEGEN: TW/USPS-T12-36-40 (September 25, 1997)

Pursuant to sections 25 and 26 of the Rules of Practice, Time Warner Inc. (Time Warner) directs the following interrogatories to United States Postal Service witness Degen (USPS-T-12). If witness Degen is unable to respond, we request that a response be provided by an appropriate person capable of providing an answer.

Respectfully submitted,

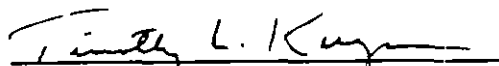
  
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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Timothy L. Keegan

September 25, 1997

## SEVENTH SET OF INTERROGATORIES TO WITNESS DEGEN (USPS-T-12)

TW/USPS-T12-36 Please refer to your answer to TW/USPS-T12-24a, in which you give the relationship between tally costs and volume variable costs in a cost pool.

- a. Please provide the sum of the tally costs in each cost pool.
- b. Please provide, for each cost pool, the sum of tally costs in each of the data sets ADW.MODS, WORK.SSVCNU, WORK.DIRECT, WORK.MIXED and OUT1.NOTHAND, created in MOD1DIR for MODS facilities, and the corresponding data sets created for BMC's and Non-MODS facilities.
- c. Do all tally costs for CAG A-J clerks and mailhandlers add up to the accrued costs for Segment 3? If no, why not?
- d. Do all BMC tally costs for clerks and mailhandlers add up to the accrued clerk and mailhandler wage costs at BMC's? If no, why not?

TW/USPS-T12-37 Please refer to your answer to TW/USPS-T12-26b, in which you indicate three types of question 18 responses that may lead to activity code 6523 being assigned to a not handling tally.

- a. Besides the three types of question 18 responses that you have mentioned, are there any other ways in which activity code 6523 may be assigned to a not handling tally? If yes, please describe each such scenario.
- b. Please provide, for each cost pool, the volume variable 6523 not handling costs that resulted from IOCS clerks selecting the empty equipment categories in, respectively, question 18b part 2, question 18d part 2 and 18g. Additionally, please provide the 6523 not handling costs that resulted from any other combination of responses by IOCS clerks that you may have identified in response to part a above.
- c. Please confirm that the responses to question 18b part 2 to which you refer apply only in the case of an Expediter or a Dock/Ramp/Transfer Clerk working on a platform and doing something related to empty equipment without actually handling it. If not confirmed, please explain.
- d. What kinds of not handling activities associated with empty equipment would (1) Expeditors; and (2) Dock/Ramp/Transfer Clerks normally engage in?
- e. Please confirm that the responses to question 18d part 2 to which you refer apply only in the case of an employee at a distribution or related operation

that is not handling empty equipment but is on his way to, or on his way back from, obtaining equipment for use in the operation or disposing of excess equipment used in the operation. If not confirmed, please explain.

f. Please confirm that question 18g, titled "administrative and other activities", applies only to employees whose activity cannot be associated with any of the mail processing functions described in questions 18b through 18f, and that the selection of "handling empty equipment" is indicated if "the selected employee is handling or moving empty equipment but is not performing a platform or distribution and related mail processing activity." Please also explain how the description "handling empty equipment" can be interpreted to include "not handling" empty equipment.

TW/USPS-T12-38 Please refer to your answer to TW/USPS-T12-27b. Which 3-digit MODS numbers are used, in AO's, stations and branches included in the MODS data base, to describe:

- a. manual distribution of letters from 5-digit to carrier route;
- b. manual distribution of flats from 5-digit to carrier route;
- c. distribution of carrier route presorted bundles to the respective carriers;
- d. distribution of small parcels and rolls to carriers;
- e. loading and unloading mail at the platform,
- f. culling and other preparation of collection mail before it is sent to the main processing facility?

TW/USPS-T12-39 Please refer to your answer to TW/USPS-T12-28b, in which you speculate that observations of pallets inside containers may refer to empty pallets being transported in rolling stock. Please assume that an IOCS clerk observes an employee handling an all purpose container (APC) with some empty sacks and nothing else inside.

- a. Would this give rise to a 6523 (empty equipment) tally, or a tally showing a container with sacks in it?
- b. If a tally shows a container with items in it being handled, is there any way of knowing from the data base whether those items contained mail or not? If yes, how?
- c. Is it generally true that an observation of a container with one or more empty items and nothing else inside gives rise to a mixed mail container tally,

rather than a "handling empty equipment" tally? If no, please explain.

TW/USPS-T12-40 Please refer to your answer to TW/USPS-T12-28c, in which you comment that it may be difficult to count a pallet with trayed or sacked non-identical mail without delaying the mail.

a. Please confirm that whether the IOCS clerk does or does not count such a pallet, he has no way of indicating that the pallet contained trays or sacks, rather than loose bundles or pieces. If not confirmed, please explain how he would so indicate and how that information can be retrieved from the IOCS data base.

b. Please confirm that when an IOCS clerk observes a pallet containing trays or sacks with identical mail, giving rise to a direct tally, he has no way of indicating that the pallet contained sacks or trays, rather than loose bundles or pieces. If not confirmed, please explain how he would so indicate and how that information can be retrieved from the IOCS data base.

c. When an IOCS clerk observes a pallet containing sleeved trays or sacks, how does he determine whether it contains identical mail?